

**ENTERED**

September 13, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY  
COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS HOUSTON DIVISION**

<b>In re:</b>  <b>Fieldwood Energy III LLC, et al.,</b>  <b>Post-Effective Date Debtors<sup>1</sup>.</b>	§ § § § § §	<b>Case No. 20-33948 (MI)</b>  <b>Chapter 11</b>  <b>Jointly Administered</b>
--	----------------------------	---

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND  
RESETTING HEARING DATE ON PLAN ADMINISTRATOR'S OBJECTION TO  
PROOFS OF CLAIM FILED BY TALOS ENERGY OFFSHORE LLC,  
TALOS ENERGY LLC, TALOS ENERGY INC., AND TALOS PRODUCTION INC.**

[this relates to Dkt. No. 2835]

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]<sup>2</sup>; and Talos Energy Offshore, LLC, Talos Energy LLC, Talos Energy Inc., and Talos Production Inc. (collectively, “**Talos**”) regarding the Plan Administrator’s Objection to Proofs of Claim of Talos Energy Offshore, LLC, Talos Energy LLC, Talos Energy Inc., and Talos Production Inc. [Docket No. 2835] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

**WHEREAS**, on or about November 25, 2020, Talos timely filed Proofs of Claim Numbers

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

724, 780 and 786 (collectively, the “**Talos Initial Claims**”).

**WHEREAS**, on or about March 25, 2022, Talos timely filed Proofs of Claim Numbers 1083, 1085 and 1088 asserting administrative expense claims (collectively, the “**Talos Administrative Claims**”).

**WHEREAS**, the Plan Administrator filed his Objection on August 15, 2023, which included a deadline of September 14, 2023 for Talos to respond to the Objection (the “**Response Date**”) and an initial pre-trial hearing on the Objection set for October 2, 2023 at 10:30 a.m. CT (the “**Pre-Trial Hearing**”).

**WHEREAS**, the Parties have agreed to enter into and jointly submit this Stipulation extending Response Date and resetting the date of the Pre-Trial Hearing in connection with the Objection.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. The Response Date is extended to and through October 13, 2023, subject to further extensions based on the Parties’ agreement.
2. The Pre-Trial Hearing on the Objection is reset to November 6, 2023 at 10:00 a.m. CT.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

**IT IS SO ORDERED.**

Signed: September 13, 2023

  
\_\_\_\_\_  
Marvin Isgur  
United States Bankruptcy Judge

**BOND ELLIS EPPICH SCHAFFER JONES PORTER HEDGES LLP  
LLP**

By: /s/ Aaron Guerrero

Ken Green  
Texas Bar No. 24036677  
Aaron Guerrero  
Texas Bar No. 24050698  
Bryan Prentice  
Texas Bar No. 24099787  
950 Echo Lane, Suite 120  
Houston, Texas 77024  
(713) 335-4990 telephone  
(713) 335-4991 facsimile  
[Ken.green@bondsellis.com](mailto:Ken.green@bondsellis.com)  
[Aaron.guerrero@bondsellis.com](mailto:Aaron.guerrero@bondsellis.com)  
[Bryan.prentice@bondsellis.com](mailto:Bryan.prentice@bondsellis.com)

**ATTORNEYS FOR DAVID DUNN, PLAN  
ADMINISTRATOR FOR THE POST-  
EFFECTIVE DATE DEBTORS**

By: /s/ Megan Young-John

Eric M. English  
Megan Young-John  
Texas State Bar No. 24062714  
1000 Main Street, 36<sup>th</sup> Floor  
Houston, TX 77002  
Telephone (713) 226-6000  
Facsimile: (713) 226-6248  
Email: [eenglish@porterhedges.com](mailto:eenglish@porterhedges.com)  
[myoung-john@porterhedges.com](mailto:myoung-john@porterhedges.com)

**ATTORNEYS FOR TALOS ENERGY  
OFFSHORE LLC, TALOS ENERGY  
LLC, TALOS ENERGY INC., AND  
TALOS PRODUCTION INC.**